



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

October 15, 2007

Reply to
Attn Of: ETPA-088

Ref: 06-005-AFS

Forrest Cole, Forest Supervisor
Tongass National Forest
Federal Building
Ketchikan, AK 99901

Dear Mr. Cole:

The U.S. Environmental Protection Agency (EPA) has reviewed the final Environmental Impact Statement (FEIS) and Record of Decision (ROD) for the proposed **Baht Timber Sale** on Zarembo Island, Wrangell Ranger District, Tongass National Forest, in southeast Alaska (CEQ No. 20070379). Our review has been conducted in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The selected alternative in the ROD is a modified Alternative 6 and differs from the Alternative 6 in the FEIS by adding Units 4, 5, and 31 totaling 1,132 acres of timber harvest. The Preferred Alternative in the DEIS was Alternative 2 and included 856 acres of timber harvest. EPA raised environmental concerns on the draft EIS, because of potential impacts to water quality from construction of roads, stream crossings, and because of concerns about monitoring and habitat fragmentation. We also expressed support for the Alternative 4 (environmentally preferred alternative in the FEIS) and we recommended expanding the Old Growth Reserve.

Although the FEIS does not analyze the modified Alternative 6, the ROD discusses this alternative as it relates to each significant issue. Modified Alternative 6 includes three out of eight units from Alternative 3 (4, 5, and 31), but did not include units 3 and 31, which are on hold because they exist within Inventoried Roadless Areas (IRAs). Because the modified Alternative 6 is not compared and contrasted in the EIS with the other action alternatives, it is difficult to get the full picture of potential impacts of this alternative, especially its potential impacts on watersheds.

The ROD states that there will be additional harvest and road construction in four sensitive watersheds but that watershed impacts would be minimized by implementing BMPs. The ROD also states that monitoring will occur to determine whether road closure features are sufficient to preclude motorized access, and harvest units will be monitored for success of regeneration. However, the ROD does not specifically discuss water quality monitoring. The FEIS states that implementation monitoring will occur and that the unit card and road card mitigation measures will be used as the basis for determining whether recommendations were implemented for the project (Appendices 2 and 3 in the ROD). We appreciate the inclusion of Appendices and we

support the mitigation measures and the discussion of erosion controls. However, we feel that it is not clearly stated how or if water quality monitoring will occur. Furthermore, the FEIS states on page 2-7 that no project-specific monitoring is required. Therefore we continue to have concerns about potential impacts to water quality. We support water quality monitoring, particularly for sediment, and preservation of riparian buffers. We also support the least amount of new road construction and the exclusion of harvest units in the IRA.

In comparison with the Proposed Alternative in the FEIS, the modified Alternative 6 increases old growth timber harvest and will result in further habitat fragmentation, which increases impacts to high value deer winter habitat. Also, Unit 4 appears to be on the border of the Old Growth Reserve. We recommend if harvesting occurs there that sufficient trees are left to reduce the risk of an edge effect, which can result in windfall and disturbance on the outer boundaries of the OGR potentially affecting the integrity of the stand. Because of these issues, we continue to have concerns about impacts to productive old growth and habitat.

We appreciate the response to our comments regarding disclosure of 303(d) listed streams and identifying that none exist in the project area, for including a discussion on activities that have occurred during Tribal consultation, and for updating Figure 1-2.

Thank you for the opportunity to comment on this final EIS. If you would like to discuss our comments, please contact Lynne McWhorter, at (206) 553-0205 or by electronic mail at mcwhorter.lynne@epa.gov or me at (206) 553-1601.

Sincerely,

/s/

Christine Reichgott, Manager
NEPA Review Unit